

EX-103

**Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

IN THE MATTER OF

PR DOCKET 93-267

RECEIVED

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EX PARTE PRESENTATION AND COMMENTS ON PR DOCKET 93-276
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TO THE HONORABLE, THE COMMISSIONERS OF THE FEDERAL
COMMUNICATIONS COMMISSION:

1. INTRODUCTORY COMMENTS

May it please the Commission, my name is Douglas N. Stracener, 15286 Becky Lee Drive, Baton Rouge, Louisiana. I am licensed in the Amateur Radio Service as call sign KA5YSY as an Extra class licensee. I note to the Commission that my wife Judy is likewise an Extra class amateur operator as KB5ACA, and is a volunteer examiner. I have been licensed since 7/29/86. Professionally I am an attorney at law. I further participate in the volunteer examiner program as a coordinating VE, Number 3243 with the W5YI-VEC, and am also certified as an ARRL-VEC examiner. My team over the past years has administered examinations to hundreds of prospective operators in the southern Louisiana area, and we have had participants from all over the country and several foreign countries take examination elements with our team.

I am not in favor of the proposed rule making because I feel that the Commission is already handling the license delay problem in a timely manner with the coming of the electronic filing of Form 610 information. My VE Team is already preparing to use electronic manifesting of our test sessions and

communicate those results to the VEC office of Mr. Fred Maia, who is developing appropriate software for the VE teams.

As requested by the Commission I will make some specific comments on the proposal.

SPECIFIC COMMENTS ON PR 90-376

1. The proposal to the Commission which initiated this proceeding correctly identified a problem with long delays of sometimes up to 90 days from the successful completion of initial amateur license examinations to the receipt of the actual license and call sign. This is correctly seen as an unfortunate situation where the new amateur is in a "limbo" where he probably has the equipment to begin operations in the Amateur Service, and is qualified to do so but for a lack of a piece of paper.

2. As a result of Congress passing Public Law 102-538 authorizing electronic filing of forms , the Commission is now in the process of upgrading the data processing system of the amateur service to allow for electronic filing. The new version of Form 610 has been issued for pending usage with the new system which will specifically allow electronic filing of the data from the VEC offices directly to the FCC Gettysburg facility for license issuance. This system, when fully operational, will properly address the delays of having to have Commission employees verify and do data entry from the paper Form 610's into the computer. This results in two benefits to the Commission and at least two real benefits to the Amateur Radio Service.

The Commission first benefits from the reduction of manpower required for data entry and validation of the incoming Form 610's. Secondly, the reduction of manpower requirements reduce the monetary costs of processing the applications and reduce pressure on the already strained budget of the

Commission, or at least allow use of manpower and other resources on other problems yet to be solved.

The Amateur Radio Service benefits first by having far more rapid processing of new applicant information and rapid issue of the original license documents to the applicant. Secondly, for upgrades, the same increased speed is available and the licensee who upgrades no longer must identify with an "Interim" identifier of /KT, /AG, /AA, or /AE for sometimes lengthy periods of time as now required.

3.

I have two major concerns to the proposal of self-assignment of a callsign until the Commission issues an original document

First, there is absolutely no possibility of the Commission identifying a self assigned callsign in the event that enforcement is necessary. This results from the lack of any information on who or where the operator is. There is no possibility of verification of successful completion of license examination elements. It in all likelihood will cause a major increase in difficulty for the Commission in attempting to locate the inevitable pirate operators who, knowing the assignment procedure, will simply make up a call sign, operate , and then make up another one if found out.

Secondly, I call the Commission's attention back in history about 25 years in the Citizens Radio Service. In the early days of that service I was licensed as KKR 6223. This was a commission assigned callsign under the regulations. After the explosive growth of the Citizens Radio Service, the Commission was unable to handle the heavy load of applications for licenses, and at some point issued an NPRM not unlike the proposal now before you, which likewise allowed a "temporary" callsign assignment of combinations of initials, and zip code, if memory serves me correctly. This allowed operation until the real call was

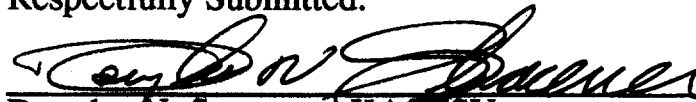
issued. The result of this decision was that millions of people purchased CB radios and issued themselves "temporary" callsigns which became "permanent", and then non-existent. Later the Commission dropped the license requirement altogether probably due the futility of attempting to enforce any regulations on the Citizens Radio Service. The result is that the 27mhz band is essentially a wastland useless to anyone other than the pirates using illegal equipment and causing most of the complaints of consumer electronics interference the commission receives.

4.

I greatly fear that the Amateur Radio Service will likewise be destroyed by adoption of this ill-conceived and unnecessary rule. All the new licensees I have tested hate the wait, but across the board, all have said that the admission to the ranks of licensed amateurs was worth the effort and the initial wait for license. The new system being implemented by the Commission for electronic filing amply addresses the concerns of license delays in an appropriate manner without the danger to the service that this NPRM presents.

I urge the Commission to vote "NO" on this NPRM as it is unnecessary, ill-timed, and a potential destruction of the Amateur Radio Service and what is stands for.

Respectfully Submitted:



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